

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA**



GABRIELLE BARBOUR,

Plaintiff,

v.

MERRICK GARLAND, Attorney General
of the United States, named in his official
capacity, as the head of the Department of
Justice,

Defendant.

Civil Action No. 1-21-cv-00883-PTA-JFA

MOTION FOR STAY OF PROCEEDINGS

Plaintiff in the above-captioned matter, hereby moves this Court for a 60-day stay of proceedings, adjusting the pre-trial conference date to Monday, November 25, 2024, and the date to complete discovery to March 11, 2025. Good cause exists for this motion, and Plaintiff states as follows:

1. Plaintiff's District Court Counsel withdrew from representing Plaintiff in the above captioned matter on August 29, 2024.
2. Plaintiff's Appellate Counsel is unable to represent her in the above-captioned matter.

3. Plaintiff requests sixty days to hire new counsel and bring counsel up to speed on the above-captioned matter.
4. Plaintiff's Appellate Counsel and Defendant's counsel are currently engaged in active settlement negotiations. Granting Plaintiff's stay request would allow settlement negotiations to continue while Plaintiff seeks counsel.
5. No party will be prejudiced by the granting of the requested stay, and granting the stay will conserve the Court and Parties' resources, particularly if the Parties are able to settle the matter prior to the pre-trial conference.
6. A proposed order consistent with the motion is attached.

In light of the forgoing, Plaintiff respectfully request that the Court grant this motion for a stay of proceedings.

Dated: August 30, 2024

Respectfully Submitted,


/s/ Gabrielle Barbour

Pro-Se

grb2122@columbia.edu

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
_____DIVISION**

Gabrielle Barbour
Plaintiff(s),

v.

Civil Action Number: 1:21-cv-00883

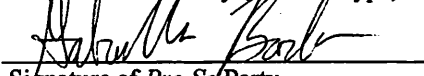
Merrick Garland
Defendant(s),

LOCAL RULE 83.1 (N) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared or assisted in the preparation of Motion for a Stay of Proceedings.

Gabrielle Barbour
Name of *Pro Se* Party (Print or Type)


Signature of *Pro Se* Party

Executed on: August 30, 2024 Date)